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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NAVAZ DOWLING,

Defendant.

2:12-CR-0082-MMD-VCF

**UNOPPOSED MOTION TO CONDUCT A
PRE-PLEA PRESENTENCE
INVESTIGATION REPORT AND
PROPOSED ORDER**

COMES NOW, defendant, NAVAZ DOWLING, by and through his counsel, JAMES A. ORONoz, ESQ., and hereby moves this Court for an Order granting the instant motion for a Pre-Plea Presentence Investigation Report to be prepared by the United States Department of Parole and Probation.

1. It is counsel's understanding that Mr. Dowling has been convicted of a felony offense outside of Nevada. Counsel is unaware of any additional convictions. Accordingly, counsel believes that Mr. Dowling has a Criminal History Category of I. Mr. Dowling's Criminal History Category will drastically impact his sentencing exposure, negotiations, and his decision as to how he should proceed in this matter. A pre-plea presentence investigation report will promote judicial economy and aid in the manner in which this case is timely resolved.

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2 **UNITED STATES DISTRICT COURT**

3 **DISTRICT OF NEVADA**

4
5 UNITED STATES OF AMERICA,

6 Plaintiff,

7 vs.

8 NAVAZ DOWLING,


9 Defendant.

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)
) 2:12-CR-0082-MMD-VCF
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10 **ORDER**
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12 IT IS HEREBY ORDERED that that the United States Department of Parole and
13 Probation will prepare a Pre-Plea Pre-Sentence Investigation Report on Defendant Navaz
14 Dowling.
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16 DATED this 8th day of August, 2012.

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18 _____
19 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF ELECTRONIC SERVICE

2 The undersigned hereby certifies that I am an employee of Oronoz & Ericsson
3 L.L.C. and is a person of such age and discretion as to be competent to serve papers.

That on August 8, 2012, I served an electronic copy of the above and foregoing
UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCE
INVESTIGATION REPORT AND PROPOSED ORDER by electronic service (ECF) to
the person(s) named below:

0 DANIEL G. BOGDEN
United States Attorney
1 333 Las Vegas Blvd. South, #5000
Las Vegas, NV 89101
2 *Counsel for United States*

3 KIMBERLY FRAYN
4 Assistant United States Attorney
333 Las Vegas Blvd. South, #5000
5 Las Vegas, NV 89101
Counsel for United States

/s/ Lucas Gaffney, Esq.
Employee of Oronoz & Ericsson L.L.C.